

**From:** [Kaarin Nelson Schaffer](#)  
**To:** [Joseph G. Schmitt](#); [Bill Egan](#); [Heidi J.K. Fessler](#)  
**Cc:** [Burkhardt, Michael S.](#); [Jacobs, Benjamin K.](#); [Mackie, Eric L.](#)  
**Subject:** RE: Deering Follow Up  
**Date:** Friday, June 9, 2023 7:43:00 PM  
**Attachments:** [image001.png](#)

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Joe,

One more thing, we will agree to a continuance if you feel it is necessary to allow you to get up to speed on the damages issues. And/or we could discuss with the Court re-opening discovery for the limited purpose of hiring damages experts.

Kaarin

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**From:** Joseph G. Schmitt <[jschmitt@nilanjohnson.com](mailto:jschmitt@nilanjohnson.com)>  
**Sent:** Friday, June 9, 2023 7:27 PM  
**To:** Kaarin Nelson Schaffer <[Kaarin@conardnelson.com](mailto:Kaarin@conardnelson.com)>  
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**Subject:** RE: Deering Follow Up

Kaarin,

Putting aside the other issues – I just want to confirm that you have no economist or expert witnesses in this matter. You reference an economist below, which is the reason for my question.

That doesn't mean that you can't consult with someone, of course, but if you intend to ask the Court to present expert testimony we obviously need to know that.

Thanks,

Joe

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**From:** Kaarin Nelson Schaffer <[Kaarin@conardnelson.com](mailto:Kaarin@conardnelson.com)>  
**Sent:** Friday, June 9, 2023 5:50 PM  
**To:** Joseph G. Schmitt <[jschmitt@nilanjohnson.com](mailto:jschmitt@nilanjohnson.com)>  
**Subject:** Deering Follow Up

Joe,



Thank you for the call this morning. I am looking through the documentation I sent to you back in May. I made an error in not putting all the forms of Ms. Deering's compensation in her 2022 compensation at Anaplan. She received a bonus and RSUs that I missed. We delivered all of the documents related to that number a few days ago. We will update the number and are working with an economist to make sure its accurate. In the meantime, it appears this new analysis will work to your client's benefit by reducing the calculation of lost wages.

I am around this weekend if you'd like to discuss this further.

Thank you,  
Kaarin

## Kaarin Nelson Schaffer

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